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July 6, 2018

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jason Galanis et al
16-cr-0371-4 (RA)

Dear Judge Abrams:

I am writing on behalf of the defense lawyers in the above-entitled case regarding the post-trial motion schedule. This past week we had the opportunity to review our schedules and also confer with the government and we are asking for a slight modification of the court's schedule based on the following. Undersigned counsel for Bevan Cooney has an opening appellate brief due on July 30, 2018 in the case of *Jaquan Walters*, 15CR644 (AJN). This was a murder case in furtherance of drug trafficking before Judge Alison J. Nathan which culminated in a bench trial. There are significant issues being raised on appeal. The Second Circuit granted my motion to extend filing my opening brief in light of the trial before Your Honor. I previously scheduled to take a vacation with my family following the filing of this brief during the first week of August. As the Court knows the trial before Your Honor required my round the clock preparation for many months leading up to the trial and then a 5 week trial. I was not able to simultaneously work on my appellate brief and for that reason the Court granted me two extensions.

The parties are all in agreement that the following schedule would be acceptable. Motions due August 20, 2018. Opposition papers due September 14, 2018 and Reply briefs due September 28, 2018. The Government has no objection.

Mr. Touger has also indicated that he would need additional time to prepare his post-trial motions in light of his current schedule. Based on the foregoing and in the interests of my ability to properly prepare my appeal in the *Walters* case and Mr. Cooney's post trial motions, I would ask the Court modify the schedule as requested. Thank you for your consideration.

Respectfully submitted,

/s/ Paula J. Notari
Paula J. Notari

cc: All parties ECF